

# Arnold & Porter

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Modifications granted on	
consent.	
June 3, 2024	
SO ORDERED:	<i>Richard M. Berman</i> Richard M. Berman, U.S.D.J.
Date: 6/4/24	

## BY ECF AND ELECTRONIC MAIL

Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Keonne Rodriguez*, 24 Cr. 82 (RMB)**

Dear Judge Berman:

We write on behalf of Keonne Rodriguez, the defendant in the above-referenced matter. Mr. Rodriguez's bail conditions currently require home incarceration. Having conferred with the Government and Pretrial Services, we respectfully request that this requirement be modified to home detention under the supervision of Pretrial Services. We also propose that the home be defined to include the curtilage, so that Mr. Rodriguez can go outside to his front porch, front yard, and fenced-in back yard without having to obtain advance permission. The Government and Pretrial Services both consent to this proposal.

Respectfully submitted,

/s/ Michael Kim Krouse

Michael Kim Krouse

cc: AUSA Andrew Chan  
AUSA David Felton